

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMDOCS (ISRAEL) LIMITED, an Israeli
Corporation,

Plaintiff,

v.

OPENET TELECOM, INC., a Delaware Corporation,
and OPENET TELECOM LTD., an Irish Corporation,

Defendants.

Case No. 1:10cv910 (LMB/TRJ)

**PLAINTIFF’S MOTION TO FILE OPPOSITION BRIEF AND SELECTED
ACCOMPANYING EXHIBITS UNDER SEAL**

Plaintiff Amdocs (Israel) Limited (“Amdocs”) respectfully moves to file under seal Amdocs’ Opposition To Openet’s Proposed Claim Constructions And Motion For Summary Judgment Of Non-Infringement And Invalidity, and selected exhibits to the Declaration of Michelle E. Kanter in Support of its opposition, specifically, Exhibits 10, 13-15, 19-23, and 26-64 (“the subject materials”). The basis for this request is that the defendants have designated certain materials as “Highly Confidential” or “Highly Confidential – Source Code” under the Court’s Protective Order, thereby requesting that these materials not be made part of the public record. In order to avoid a potential violation of the Protective Order, Amdocs is moving to file these materials under seal, as well as portions of the memorandum discussing these materials. Openet’s counsel stated that they do not object to Plaintiff’s motion to file under seal. Plaintiff Amdocs expresses no interest on its own behalf in whether the subject materials are filed under seal. Plaintiff will request that Openet redact any material it believes should not be made available to the public and will file a public version of the memorandum implementing Openet’s requested redactions.

June 16, 2011

Respectfully Submitted,

/s/
James L. Quarles III (Bar No. 44993)
Gregory H. Lantier (VSB No. 65657)
WILMER CUTLER PICKERING HALE
AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
Phone: (202) 663-6000
Fax: (202) 663-6363
gregory.lantier@wilmerhale.com

Nels T. Lippert, *pro hac vice*
Calvin Walden, *pro hac vice*
WILMER CUTLER PICKERING HALE
AND DORR LLP
399 Park Avenue
New York, New York 10022
Phone: (212) 230-8800
Fax: (212) 230-8888

Counsel for Amdocs (Israel) Limited

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June, 2011, I will electronically file the foregoing with the Clerk of Court using CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Brian H. Pandya, Esq.
(Attorney for Openet Telecom, Inc. and Openet Telecom, Ltd.)
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
bpandya@wileyrein.com

_____/s/_____
Gregory H. Lantier (Bar. No. 65657)
WILMER, CUTLER, PICKERING,
HALE AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
Phone: (202) 663-6000
Fax: (202) 663-6363
gregory.lantier@wilmerhale.com

Attorney for Plaintiff
Amdocs (Israel) Limited